NPDES
Inspection Report

Steeler, Inc.
Seattle, WA

September 19th, 2012

Prepared by:

Brian Levo
Environmental Protection Agency, Region 10
Office of Compliance and Enforcement
Inspection and Enforcement Management Unit

Table of Contents

(Unless otherwise noted, all details in this inspection report were obtained from conversations with Bill Hitsman or from observations during the inspection.)

I. Facility Information

Facility Name:	Steeler, Inc.
SIC Codes:	3444- Sheet Metal Work
Facility Contact(s):	Bill Hitsman, Acting General Manager Office: (206) 725-2500 Cell: (206) 399-1725
Facility and Mailing Address:	10023 Martin Luther King Jr. Way S. Seattle, WA 98178
Lat/Long:	+47.510262°/ -122.279561°
Permit Number:	WAR125358

II. Inspection Information

Inspection Date:	September 19, 2012
Inspectors:	Brian Levo, Inspector EPA Region 10, OCE / IEMU (206) 553-1816 Dustan Bott, Inspector EPA Region 10, OCE / IEMU (206) 553-5502
Arrival Time:	2:00 PM
Departure Time:	3:40 PM
Weather:	Sunny
Purpose:	Determine compliance with the Washington State NPDES Industrial Stormwater General Permit and the Clean Water Act.

III. Permit Information

Steeler, Inc. is currently permitted under the Washington State NPDES Industrial

Stormwater General Permit (ISGP), with the permit number WAR125358. This permit was recently modified with the new effective date of 7/1/2012. The original effective date of the permit is 1/1/2010.

IV. Background and Activity

According to Bill Hitsman, Acting General Manager (GM), Steeler Inc. primarily forms sheet metal to make steel frames, and also makes their own brand of steel studs, screws, joints, and other steel products. The secondary business conducted by Steeler Inc. includes distribution of drywall, insulation, and various construction tools and supplies. Steeler Inc. owns 12 branch offices. The facility inspected in this report is the headquarters office. Only this facility and a facility in Newark, CA, produce steel products.

The facility is approximately 3.5 acres in size and about a third of it is either enclosed within the main building or is covered by a roof or awning (**Map 1**, **Attachment A**). Storm drain catch basins are located on all sides of the building, including under some of the awnings, but none are located inside the main building. According to the facility, storm drainage discharges off-site at a pipe located in the southwest corner of the facility.

V. Inspection Entry

This was an unannounced inspection. Dustan Bott and I presented our credentials to Mr. Hitsman upon arriving at the facility at 2:00 pm on 9/19/2012. Mr. Hitsman explained to us that he has been the Acting GM for about a year and was the Manufacturing Manager before taking on the GM responsibilities. He said that a high rate of employee turnover at Steeler Inc. was responsible for his newly designated duties. The business card he provided identified him as the Manufacturing Manager.

Mr. Hitsman did not deny us access to the facility. We were allowed to inspect all areas that we wished to inspect.

VI. Inspection Chronology

We began the inspection with an opening conference where we discussed the purpose and expectations of the inspection. We then performed a file review, conducted an inspection of the facility, and held a closing conference to discuss compliance-related concerns.

VII. Records Review

At the time of inspection, Mr. Hitsman claimed that the all of the facility files associated with the ISGP were being stored in a fire-proof safe on-site. Mr. Hitsman attempted to locate these materials but stated that they had been misplaced. The only records that we requested to review which Mr. Hitsman was able to produce were copies of both the original and the modified ISGP permits. Mr. Hitsman explained that the facility originally requested coverage under the ISGP in either 2009 or 2010, but was not granted coverage

until October of 2011.

We requested that Mr. Hitsman provide us copies of the following materials as soon as possible:

- Most recent copy of the Stormwater Pollution Prevention Plan (SWPPP)
- Most recent copy of the Spill Prevention and Emergency Cleanup Plan (SPECP)
- Discharge Monitoring Reports (DMRs) since October of 2011
- Chain-of-Custody (COC) and sampling reports since October of 2011
- Monthly visual inspection reports since October of 2011

Mr. Hitsman informed us that inspectors from both the Washington State Department of Ecology (DOE) and Seattle Public Utilities (SPU) have visited Steeler Inc. on numerous occasions in 2011. Mr. Hitsman described some of the visits and provided us a copy of a Notice of Violation (NOV) and Order for Corrective Action and Penalty sent by SPU on 8/4/2011 (**Attachment C**). According to the NOV, Mike Jeffers, SPU Environmental Compliance Inspector, conducted stormwater source control inspections of Steeler Inc. on 5/12/2011, 6/23/2011, 7/14/2011, and 7/20/2011. SPU originally noted concerns related to the Seattle Municipal Code (SMC) source control requirements following the 5/12/2011 inspection, and issued a Corrective Action (CA) letter at that time. SPU issued a Second and Final Notice related to these concerns following their 6/23/2011 inspection. Mr. Jeffers noted during his 7/14/2011 inspection that the facility had made some minor improvements but still largely failed to comply with the original CA letter.

During the 7/20/2011 facility inspection, Mr. Jeffers was accompanied by Bob Wright, DOE Water Quality Inspector. According to Mr. Hitsman, both Mr. Wright and Donovan Gray, DOE Urban Waters Inspector, inspected Steeler Inc. in July and September of 2011. Mr. Hitsman indicated that he has been working with DOE to address their ISGP compliance concerns.

I asked Mr. Hitsman if the facility conducts any sampling. He stated that Steeler Inc. has a contractor that conducts all of the sampling required in the permit. Mr. Hitsman was not aware of the specific parameters required to be monitored, the frequency in which sampling is to be conducted, nor was he aware of the sampling locations or the name of the contract company. He said he thought there were 4 different locations that the contractors sampled. He also admitted that sampling has only been conducted once in the year he has been Acting GM. I informed Mr. Hitsman that the ISGP requires that sampling be conducted quarterly.

Following the inspection I researched Steeler Inc. on the DOE Permit and Reporting Information System (PARIS) website. According to PARIS, Steeler Inc. has three benchmark monitoring locations. In PARIS these locations are identified as ND7, WD4, and SD1, corresponding to the north, west, and south sides of the building respectively. During the inspection, Mr. Hitsman provided me with a sheet that identifies some of the facility catch basins, including these monitoring points (**Attachment D**). However, the

sheet does not specifically identify the monitoring points as sampling locations, nor did Mr. Hitsman indicate these areas as sampling locations.

VIII. Facility Review

Following the file review, Mr. Hitsman escorted Mr. Bott and me on our site inspection. During the site inspection we only reviewed outdoor locations.

We began the site inspection by examining the stormwater catch basins on the north side of the facility building, located in the storage yard (**Photos 1-4**, **Attachment B**). According to Mr. Hitsman, the stormwater catch basins are connected by storm sewer lines that flow from west to east (**Map 1**). However, he stated that due to underground pipe installation by the City of Seattle, after stormwater reaches the catch basin near the northeast corner of the building, stormwater is rerouted back west towards the catch basins upstream before inevitably flowing south along the east side of the building. Mr. Hitsman admitted that the flow he described was circuitous and he wasn't exactly sure how the stormwater was piped but he was able to draw the general stormwater system flows on a black and white map he provided us (**Map 2**).

At the time of inspection, galvanized steel product was being stored without cover throughout the facility yard (**Photo 2**). Some of this steel was covering the catch basin furthest upstream in the facility's storm drainage system (located north of the awning on the northwest part of the building) and could not be found. We informed Mr. Hitsman that galvanized steel could be a source of stormwater pollutants such as zinc. Mr. Hitsman told us that SPU had brought up that same concern and that SPU sampled the galvanized steel only to conclude that it was not a significant source of pollution. A copy of the analysis conducted by SPU was not available at the time of inspection.

The north side of the facility building had multiple metal awnings extending out from the building roof. We asked Mr. Hitsman where roof runoff goes and he informed us that roof drainage is piped belowground where it connects to the storm sewer lines. The awnings provide additional storage space for galvanized steel product as well as storage for other supplies and equipment. I noticed that two of the awnings had flaps hanging from down from their roofs (**Photo 9**). At the time of inspection, the facility was operating with some of its doors open on the north side of the building. Mr. Hitsman said that one of the main operations conducted inside the building was steel cutting, a process that requires lubricant oil, and that the flaps help reduce the amount of lubricant oil residue that could deposit on yard surfaces exposed to stormwater. Mr. Hitsman also stated that that facility plans on extending awning coverage on the north end of the building to close the gap between the two main sections of awning currently in place.

We observed an oil stain near a parked van at the catch basin closest to the northwest corner of the facility (**Photo 4**). Mr. Hitsman asked an employee in the vicinity about the stain. The employee replied that it was an oil leak from a vehicle that occurred about 3 weeks ago and had been cleaned up. Mr. Hitsman also stated that the facility typically has filter socks installed in their catch basins and was unsure why they were not installed. We

did not observe any filter socks installed at the time of inspection. The location of the oil stain also appeared to be the only area where roof runoff was not piped directly underground but instead drains on the concrete surface in vicinity of the catch basin shown in **Photo 4**.

There was a catch basin on the west side of the facility (**Photo 5**) that Mr. Hitsman said flows south and connects to the last catch basin before stormwater discharges off-site. Mr. Hitsman told us that the storm sewer lines discharge off-site at the southwest corner of the property to a stormwater catch basin of the neighboring Papé Material Handling business. From there, Mr. Hitsman explained, the stormwater then discharges from Papé Material Handling to a drainage ditch that inevitably discharges to the Duwamish River.

Before discharging off-site, Mr. Hitsman told us there are a series of three belowground settling tanks installed at the catch basin located at the southwest corner of the facility (**Photo 6**). He claimed that all stormwater passes through these settling tanks before being discharged. He also told us that SPU required that the roof drainage from the neighboring facility to the south of Steeler Inc. be piped belowground into the Steeler Inc. storm sewer system (**Map 1**).

At the time of inspection, additional galvanized steel parts were being stored uncovered on the south side of the building (**Photo 6**). Mr. Hitsman pointed out a barrel being stored under cover that collects compressor condensation (**Photo 7**). Mr. Hitsman told us that SPU required that the facility collect the condensate instead of allowing it to discharge into the storm sewer. Mr. Bott explained that discharge of compressor condensate is allowed by the ISGP, but may not be allowed by the City of Seattle.

Mr. Hitsman showed us the catch basin near the southeast corner of the building and explained that the City of Seattle has its storm sewer system connected to this catch basin (**Photo 8**). He said that the city's storm drain flows south along Martin Luther King Jr. Way S. and then diverts across the Steeler Inc. property through the southern half of their storm sewer lines, settling tanks, and through their discharge point (**Maps 1 & 2**).

Finally, we walked the northern perimeter of the facility. Mr. Hitsman told us that stormwater on the north side of the property flows west to east along the northern perimeter towards the northeast corner of the facility. He pointed out a raised concrete surface that inhibits stormwater from flowing north onto the neighboring property (**Photo 10**). Once the stormwater reaches the northeastern corner, Mr. Hitsman claimed that the slope of the yard channels the stormwater south to the catch basin located near the northeast corner of the building (**Photo 1**). The northern section of the yard appeared to slope east, but there did not appear to be a slope or any structure in place to divert stormwater runoff south. Instead, it appeared that stormwater would continue flowing east outside the facility fence and into the street (**Photo 11**). Mr. Hitsman admitted that some of the stormwater drainage might make it out to the street, but he pointed out that any drainage discharged into the storm drains along the street would flow right back into the facility's storm sewer system at the catch basin near the southeast corner of the Steeler Inc. building.

IX. Observed Discharge

We did not observe any discharge at the time of inspection.

X. Receiving Water

The nearest surface water to this facility is the Duwamish River.

XI. Areas of Concern

A. *Records Retention & Availability*

Section S9.C.1. of the ISGP states that the permittee shall retain a copy of the following documents onsite for a minimum of five years:

- Records of all sampling information
- Copies of all laboratory reports
- Inspection Reports
- Any other documentation required by the permit

Section S9.C.3. of the ISGP states that "the permittee shall make all plans, documents and records required by this permit immediately available to Ecology or the local jurisdiction upon request."

At the time of inspection the facility did not have copies of their SWPPP, SPECP, DMRs, COCs, sampling reports, or visual monitoring reports available. During our inspection Mr. Hitsman promised to provide these materials electronically later that same day (9/19/2012). In a follow-up phone call on 9/26/2012, Mr. Hitsman stated that he was still getting all the files together and would electronically send them to me by 9/27/2012. In a second follow-up phone call on 9/28/2012, Mr. Hitsman said he had 9 of the 20 pages of his facility files ready to send to me, but would have to make new copies of some of the requested materials before they could be sent. He promised that he would electronically send them to me by the morning of 10/1/2012. None of the requested facility files were provided as of the completion date of this inspection report.

It is unclear if the facility has composed a SWPPP or a SPECP. In addition, even though Mr. Hitsman claimed a contractor conducts their sampling, there is no evidence that DMRs have been submitted. The DOE PARIS website also does not show any indication that DMRs have been submitted by Steeler Inc. since ISGP coverage began in October, 2011. Mr. Hitsman also admitted during the inspection that he was aware of contractors sampling only once in the last year. It is also uncertain if the facility has any COCs, sampling reports, or visual monitoring reports.

B. *Oil Leak*

Section S3.B.4.b.i.3) of the ISGP states that the SWPPP must include preventative maintenance Best Management Practices (BMPs) including a requirement that the permittee must:

b) "Inspect all equipment and vehicles during monthly site inspections for leaking fluids such as oil, antifreeze, etc. Take leaking equipment and vehicles out of service or prevent leaks from spilling on the ground until repaired.

c) Immediately clean up spills and leaks (e.g., using absorbents, vacuuming, etc.) to prevent the discharge of pollutants."

At the time of the inspection there was an oil stain located between a parked van and a stormwater catch basin (**Photo 4**). According to a facility employee, this stain resulted from an oil leak that had occurred 3 weeks ago and had been cleaned up immediately.

It is unclear if the facility implements BMPs for the prevention of spills and leaks. In addition, it does not appear that monthly inspections are conducted.

C. *Filter Socks Not Installed*

Mr. Hitsman claimed that filter socks are typically installed in each of the catch basins. At the time of inspection there were no filter socks installed at any of the catch basins. Mr. Hitsman was unsure why they weren't being implemented at that time.

D. *Parking in Proximity to Storm Drains*

At the time of inspection, a van was parked in close proximity to a catch basin with an oil stain (**Photo 4**). It is unclear if parking vehicles in close proximity to, or on-top of, stormwater catch basins is a regular occurrence. We informed Mr. Hitsman that we were concerned of the possibility of additional vehicle fluid discharges into the storm drains.

E. *Exposed Galvanized Steel*

The facility was storing galvanized steel product in their yard on both the north and south sides of the building (**Photos 2, 3, 6**). While some of this steel was packaged in rolls, it appeared a majority of the product was being stored uncovered. Mr. Hitsman stated that SPU had already sampled the steel and discounted it as a potential stormwater pollution source. We told Mr. Hitsman that without reviewing the SPU sample report, and without reviewing copies of the facility DMRs, we would still consider the exposed galvanized steel as a potential pollution source.

F. *Catch Basin Covered by Galvanized Steel*

At the time of inspection, Mr. Hitsman was unable to locate the furthest upstream catch basin connected to the facility storm sewer system. He stated that it was covered by the

exposed galvanized steel being stored in the yard. We informed him that we were concerned about covering the catch basin both because the galvanized steel is a potential pollution source and covering the catch basin inhibits access to the drain.

XII. Closing Conference

A closing conference was held with Mr. Hitsman to discuss our inspection observations. We discussed all of the areas of concern listed above and then thanked him for his time and assistance with the inspection.

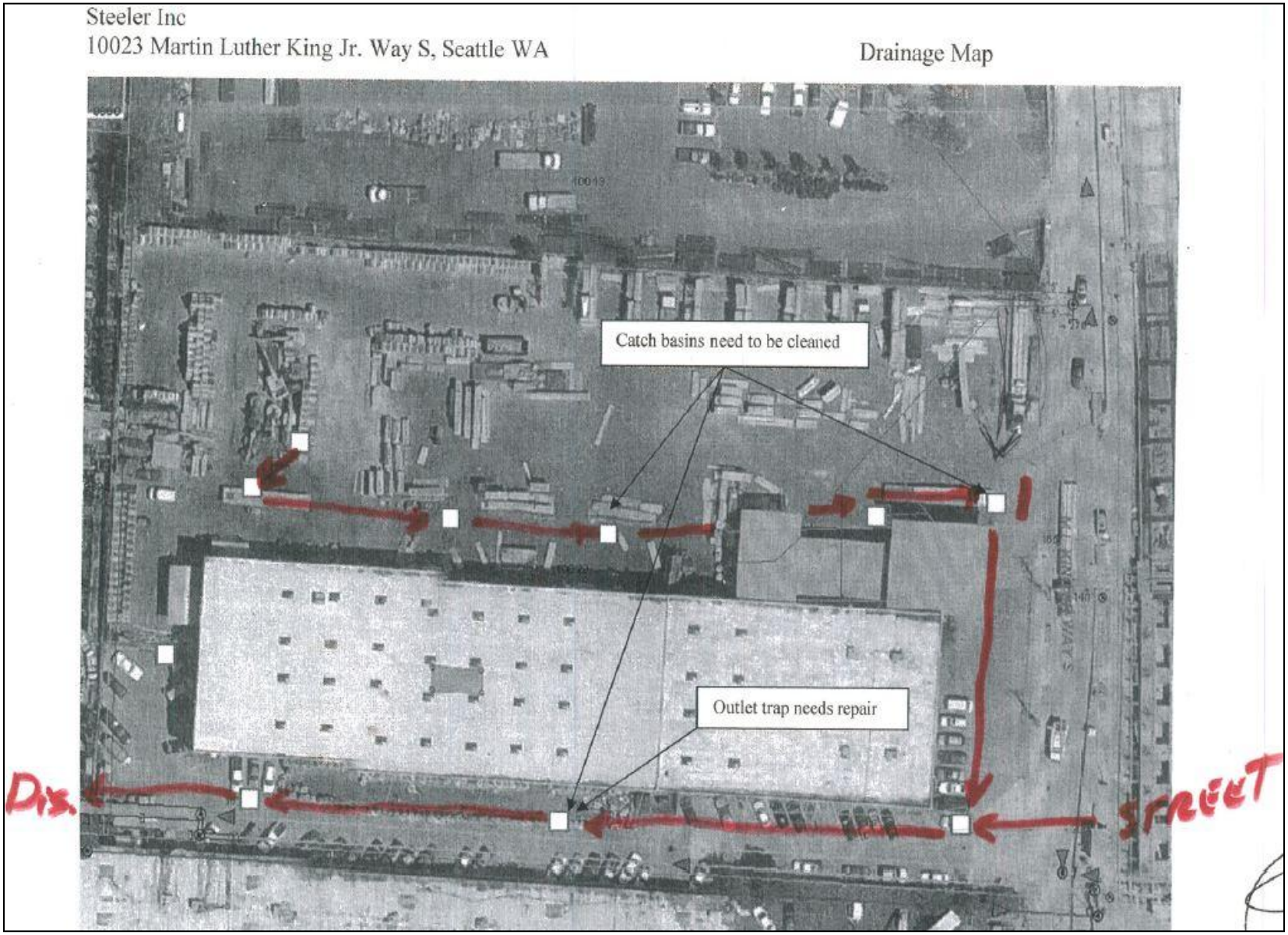
Report Completion Date: _____

Lead Inspector Signature: _____

ATTACHMENT A

Site Maps

Map 1: Aerial photo of Steeler Inc. with approximate stormwater catch basins, storm sewer lines, flow direction, and discharge point displayed. Map was created using ESRI ArcMap 10.0. Storm sewer system was digitized by georeferencing **Map 2** below and by using information from our conversations with Mr. Hitsman.



Map 2: Storm drainage map provided by the facility. Red lines were drawn by Mr. Hitsman at the time of inspection, and they display the approximate flow of stormwater at the facility.

ATTACHMENT B

Photo Log

(All photographs were either taken by Dustan Bott or Brian Levo on September 19, 2012)

NOTE: The date and time digitally printed on the photos in this log are incorrect. The camera date/time were not calibrated before taking photos.

Photo 1 (SI851652): Northern view along the east side of the facility at the yard entrance. According to the facility, stormwater along the northern fence line channels to the northeastern corner and then is diverted south (yellow arrows) by the slope of the yard to the catch basin pictured here.

Photo 2 (SI851655): Northeastern view of outside operations and uncovered galvanized steel product being stored in the yard.

Photo 3 (SI851654): Western view of the stormwater catch basin located under an awning on the north side of the building. More galvanized steel product stored both under the awning (left) and uncovered in the yard (right).

Photo 4 (SI851656): Western view of the stormwater catch basin at the northwest corner of the building, also located under an awning. Note the oil stain (yellow arrow). According to the facility, this spill occurred approximately 3 weeks ago and was cleaned up immediately after it occurred.

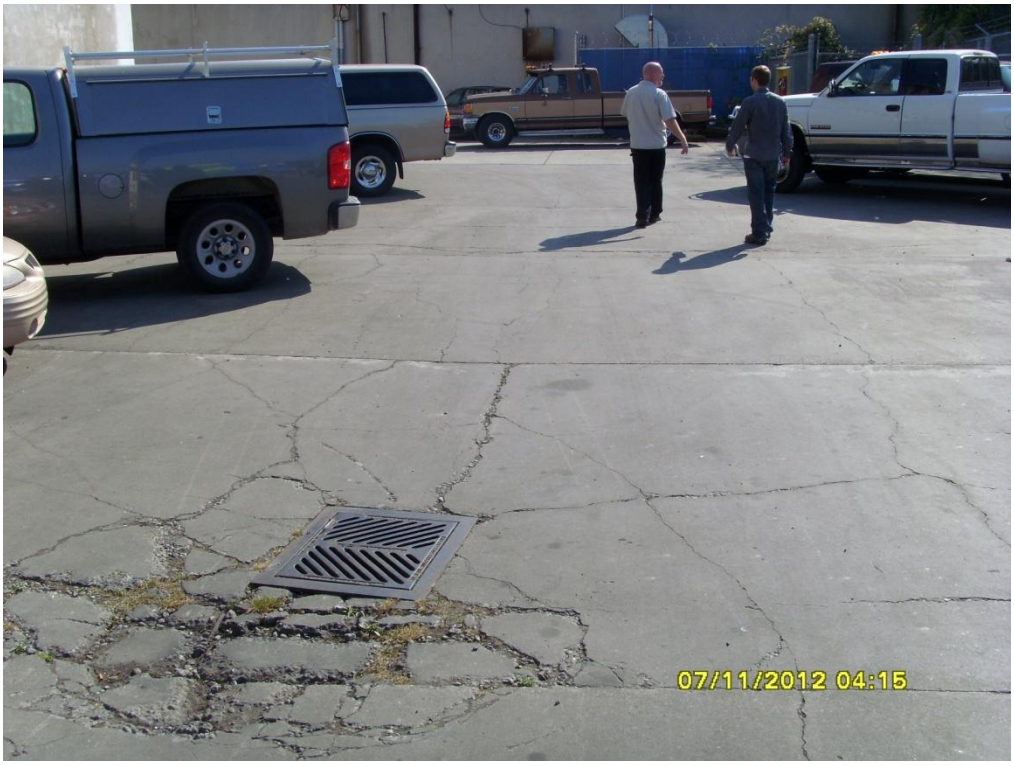


Photo 5 (SI851659): Southern view of catch basin on the west side of the building. According to the facility, this drain flows south towards the settling tanks.

Photo 6 (SI851660): Eastern view of the south side of the building (left). According to the facility, three stormwater settling tanks are located beneath these drains.

Photo 7 (SI851662): Compressor condensate storage drum located under cover on the south side of the building.

Photo 8 (SI851663): Eastern view of the catch basin near the southeastern corner of the building. According to the facility, the city storm sewer system flows from the street to this catch basin (red arrow) and then flows to the southwest corner of the facility where it discharges through the Steeler Inc. discharge point.

Photo 9 (SI851674): Western view of an awning on the northwest side of the building. Note the awning has flaps to reduce lubricant oil (used for steel cutting) residues from depositing on surfaces exposed to stormwater.

Photo 10 (SI851669): Northern view of fence line. According to the facility, stormwater flows from west to east along this boundary (yellow arrow).

Photo 11 (SI851676): View of the northeastern corner of the facility yard from outside the fence. According to the facility, stormwater follows the fence line along the north side of the property and is diverted south from this corner to the storm drain shown in **Photo 1** (yellow arrows). However, at the time of inspection, it appeared that stormwater would most likely continue flowing east past the fence and into the street (red arrow).

ATTACHMENT C

SPU - Notice of Violation and Order for Corrective Action and Penalty

ATTACHMENT D

Discharge Location Sheet